

United States District Court
For the District of Rhode Island

Elizabeth Crabtree,
Plaintiff,

vs.

No. 1:17-cv-00045

Brown University in Providence in the
State of Rhode Island and Providence Plantations,
Defendant

Answer of Defendant
Brown University

Defendant Brown University responds to the numbered paragraphs of Plaintiff's
Complaint as follows:

1. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
2. Admitted.
3. Admitted.
4. Admitted.
5. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
6. Because this paragraph refers to "Right to sue letters described in paragraphs 5 and 6 above, Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.

Count I
Age Discrimination in Employment Act, 29 U.S.C. § 621, et seq.

7. Defendant incorporates all previous responses to paragraphs 1 through 6.
8. Defendant denies that Plaintiff's duties were considerably expanded without any corresponding increase in salary. Defendant admits the remaining allegations of this paragraph.
9. Denied.
10. Denied. Moreover, Defendant lacks knowledge or information sufficient to form a belief about what Plaintiff's "concerns" were.
11. Denied.
12. Admitted.
13. Denied. Moreover, Defendant lacks knowledge or information sufficient to form a belief as to what Plaintiff believed.
14. Admitted.
15. Denied.
16. Denied.

Count II
Title VII of Civil Rights Act of 1964

17. Defendant incorporates its answers to all previous paragraphs.
18. Denied.
19. Denied.

Count III
Rhode Island Fair Employment Practices Act

20. Defendant incorporates its answers to all previous paragraphs.

21. Denied.

22. Denied.

Affirmative Defenses

First Defense

The complaint fails to state a claim upon which relief may be granted.

Second Defense

The complaint is barred in whole or in part by the applicable statute of limitations.

Third Defense

Any pay disparity between plaintiff and any alleged comparators is the result of legitimate factors other than age or sex, including prior salary, experience, skill, expertise, effort and responsibility.

Fourth Defense

Plaintiff is not entitled to punitive damages because at no time did Defendant engage in discriminatory practices with malice or reckless indifference to Plaintiff's rights.

Fifth Defense

Plaintiff's remedies are barred to the extent that she has failed to mitigate her damages.

Sixth Defense

The decisions and actions or failures to act, if any, respecting Plaintiff and her employment were neither discriminatory nor motivated by retaliation but were justified by legitimate, non-discriminatory reasons and based on factors other than Plaintiff's gender, sex, and/or age.

Jury Trial Demand

Defendant demands a jury trial as to all counts, claims, and defenses so triable.

Defendant, Brown University

By its counsel,

/s/ Thomas R. Bender

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Certificate of Service

The undersigned certifies that on April 26, 2017, copies of this Answer of Defendant Brown University were provided to counsel of record through the Court's CM/ECF service.

/s/ Thomas R. Bender

Thomas R. Bender